My name is George J. McCouch and I hold the call K3UD. I have been licensed as an Amateur Radio operator for 41 years and once held a commercial radiotelephone license. I have qualified for all classes of Amateur Radio licenses issued by the FCC and presently hold the Extra class license and I am, and have been a member of the ARRL for 35 of my 41 years as an Amateur Radio operator. I am a Market Researcher and Analyst by profession.

I am not against segmenting our bands by bandwidth but I am against favorable action by the FCC as it regards RM-11306.

The real problem with RM-11306 is that it fosters the use of incompatible mixed modes in the various bandwidth segments. This is a recipe for interference problems that will not easily be resolved.

The largest complaints against the ARRL and CTT petitions revolves around WinLink 2000, Automatic and semi-automatic operation, proprietary hardware, software, and using our HF allocations to create some kind of an ersatz internet ISP. This will be for the benefit of an extremely small number of users with the potential to interfere with a large number of amateurs using the so called legacy modes. As some have also mentioned there seems to be sentiment about using WL2K for email from boats and RVs as a free replacement for commercial products such as Sail-Mail and others.

According to the ARRL's own recent Readex study of the state of Amateur Radio, it was no surprise when the ARRL revealed that SSB was by far the dominant mode with CW as the next most used mode. The ARRL found that 40% of all hams used CW and this included the No Code Technician licensees as part of their database universe. According to all information I could find on the subject only 4 - 8% of all hams use the so called digital keyboard modes.

Unfortunately both RM-11305 and RM-11306 seem to allow the Pactor bots to go anywhere they want to

(in RM-11305) and anywhere in the areas of bandwidth that would be shared by phone ops in RM-11306. In essence they can go where they want to causing unnecessary and damaging interference to other users in the bandwidth segments.

So, how does one identify a bot that pops up on top of your QSO? Can you politely ask it to move? Can you inform the bot that the frequency is in use? Do you invite it into your roundtable? The problem is that although you can identify a Pactor signal, you can not identify the station.

Along the same lines, how would one identify a digital phone station? You might be able to recognize the noise it makes as digital phone but how do you communicate with them to let them know that they are clobbering your QSO? Again you can not identify the station and this will stop you from trying to mediate the situation on the air or by stymied when trying to report the interference to Riley Hollingsworth.

Dave Sumner (General Manager of the ARRL) wrote in the QST magazine section of "It Seems To Us" that we had better be prepared for an increase in interference when the bots are on the roam and when any mode can go anywhere regardless of compatibility.

There are many reasons to oppose RM-11306. The ARRL did little to consult the membership on this issue and they marginalized several members of the Digital committee that crafted RM-11306 by ignoring their technically sound objections as to what the committee was doing. For me the main reason is that the ARRL itself is proposing measures that they openly admit will create more interference on our bands and the only remedy they propose is for us to prepare for it.

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